

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity
as Governor of Texas, *et al.*,

Defendants.

Case No. 3:21-CV-00259-DCG-JES-
JVB

[Lead Case]

ROY CHARLES BROOKS, FELIPE
GUTIERREZ, PHYLLIS GOINES,
EVA BONILLA, CLARA FAULKNER,
DEBORAH SPELL, BEVERLY
POWELL, SANDRA M. PUENTE,
JOSE R. REYES, SHIRLEY ANNA
FLEMING, LOUIE MINOR JR, and
NORMA CAVAZOS,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity
as Governor of Texas; JOHN SCOTT,
in his official capacity as Secretary of
State of Texas,

Defendants.

Case No. 1:21-CV-00991-DCG-JES-
JVB

[Consolidated Case]

**NOTICE OF APPEAL
TO THE SUPREME COURT OF THE UNITED STATES**

Notice is hereby given that ROY CHARLES BROOKS, FELIPE
GUTIERREZ, PHYLLIS GOINES, EVA BONILLA, CLARA FAULKNER,
DEBORAH SPELL, BEVERLY POWELL, SANDRA M. PUENTE, JOSE R.

REYES, SHIRLEY ANNA FLEMING, LOUIE MINOR JR, and NORMA CAVAZOS, Plaintiffs in the case above described, hereby appeal to the Supreme Court of the United States from the three-judge district court's Preliminary-Injunction Memorandum Opinion and Order (Dkt. 258) signed on May 4, 2022 as well as the order it modified, Order Denying Motion for a Preliminary Injunction (Dkt. 176) signed on February 1, 2022.

This appeal is taken pursuant to 28 U.S.C. §§ 1253 & 2284, which authorize direct appeals to the Supreme Court of the United States from a three-judge district court's interlocutory or permanent injunctive orders in an action challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body.

June 2, 2022

Respectfully submitted,

/s/ Chad W. Dunn

Chad W. Dunn
(Tex. Bar No. 24036507)
Brazil & Dunn
4407 Bee Caves Road
Building 1, Ste. 111
Austin, TX 78746
(512) 717-9822
chad@brazilanddunn.com

Mark P. Gaber*
Mark P. Gaber PLLC
P.O. Box 34481
Washington, DC 20043
(715) 482-4066
mark@markgaber.com

Jesse Gaines*
(Tex. Bar. No. 07570800)
P.O. Box 50093

Fort Worth, TX 76105
817-714-9988
gainesjesse@ymail.com

Molly E. Danahy*
P.O. Box 26277
Baltimore, MD 21211
(208) 301-1202
danahy.molly@gmail.com

Sonni Waknin*
10300 Venice Blvd. # 204
Culver City, CA 90232
732-610-1283
sonniwaknin@gmail.com

*Admitted *pro hac vice*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Chad W. Dunn, a member of the Bar of this Court, do hereby declare that on this date, June 2, 2022, as required by Supreme Court Rule 29, I have caused this Notice of Appeal to be filed with the Clerk of the United States District Court and service to all counsel of record will occur electronically by CM/ECF. I also declare that counsel listed below is, on this date, being served hard copies by U.S. Mail in accordance with Supreme Court Rule 29:

Counsel for LULAC Plaintiffs-Respondents
Nina Perales
Counsel of Record
MEXICAN AMERICAN LEGAL DEFENSE & EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
nperales@maldef.org
Counsel for Voto Latino Plaintiffs-Respondents

Aria C. Branch
Counsel of Record
ELIAS LAW GROUP LLP
10 G St. NW, Suite 600
Washington, DC 20002
abranche@elias.law

Counsel for Mexican American Legislative Counsel Plaintiff-Respondent
George (Tex) Quesada
Counsel of Record
SOMMERMAN McCAFFITY, QUESADA & GEISLER, LLP
3811 Turtle Creek Blvd., Suite 1400
Dallas, TX 75219
quesada@texttrial.com

Counsel for Texas NAACP Plaintiff-Respondent
Ezra D. Rosenberg
Counsel of Record
LAWYERS COMMITTEE FOR CIVIL RIGHTS UNDER LAW
1500 K Street, NW, Suite 900
Washington, DC 20005
erosenberg@lawyerscommittee.org

Counsel for Fair Maps Plaintiffs-Respondents
David A. Donatti
Counsel of Record
ACLU FOUNDATION OF TEXAS, INC.
P.O. Box 8306
Houston, TX 77288
DDonatti@jd15.law.harvard.edu

Counsel for the United States of America Plaintiff-Respondent
Elizabeth B. Prelogar
Counsel of Record
Solicitor General of the United States
Department of Justice
950 Pennsylvania Ave., N.W., Room 5616
Washington, DC 20530-0001
SupremeCtBriefs@USDOJ.gov

Daniel Joshua Freeman
U.S. DEPARTMENT OF JUSTICE

950 Pennsylvania Ave NW
Washington, DC 20530
(202) 305-4355
daniel.freeman@usdoj.gov

Counsel for Escobar and Fisher Plaintiffs-Respondents
Martin Anthony Golando
Counsel of Record
THE LAW OFFICE OF MARTIN GOLANDO, PLLC
2326 Magnolia
San Antonio, TX 78201
martin.golando@gmail.com

Counsel for Intervenor-Respondents
Gary L. Bledsoe
Counsel of Record
THE BLEDSOE LAW FIRM, PLLC
7901 Cameron Road
Building 3-360
Austin, TX 78754
garybledsoe@sbcglobal.net

Counsel for Defendants
Patrick K. Sweeten
Counsel of Record
OFFICE OF THE TEXAS ATTORNEY GENERAL
P.O. Box 12548
Austin, Texas 78711
patrick.sweeten@oag.texas.gov

Counsel for Texas Legislators
Taylor A.R. Meehan
Counsel of Record
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Suite 700
Arlington, VA 22209
(703) 243-9423
taylor@consovoymccarthy.com

/s/ Chad W. Dunn
Chad W. Dunn